

Missouri Board of Pharmacy
3/23/2020 Update on COVID-19 Webinar

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COVID-19 INFORMATION

The Missouri Board of Pharmacy has received multiple inquiries regarding COVID-19 and potential pharmacy impact. The Missouri Department of Health and Senior Services (DHSS) has established a COVID-19 informational website that includes a variety of resources for the public and healthcare professionals, including:

- A [COVID-19 Fact Sheet](#) that includes information on symptoms and virus prevention
- CDC [Guidelines for Health Care Providers](#), and
- A CDC “Situation Summary” on COVID-19 facts and statistics.

The DHSS website is located at <https://health.mo.gov/living/healthcondiseases/communicable/novel-coronavirus/>

HOTLINE:

DHSS has also established a statewide public hotline for citizens or providers needing guidance regarding COVID-19. The toll-free number is **877-435-8411**. The hotline is operated by medical professionals and is available 24 hours a day, 7 days a week.

1. DOES THE BOARD HAVE ANY RECOMMENDATIONS FOR PHARMACIES AT THIS TIME?

The Board is monitoring developments on both the state and national level. Licensees should monitor the Board's website and sign up for the Board's e-alerts to receive important updates.

Pharmacists should use their professional judgment to ensure policies and procedures are in place to protect Missouri patients. The Board also recommends the following:

- A. As always, pharmacy services must be safely and properly provided at all times. Pharmacies should take proactive steps to prevent the spread of germs and to protect Missouri patients. Proper cleaning, sanitizing and disinfection procedures must be in place. [See CDC's guidance for keeping the workplace safe.](#)
- B. The United States Environmental Protection Agency (EPA) has published an [online listing](#) of disinfectant products approved for use against SARS-COV-2, the coronavirus that causes COVID-19. The EPA list and other EPA virus related information is available online at <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
- C. Pharmacy staff should be trained on how to recognize symptoms of potential illness and what to do if they develop symptoms or come in close contact with a person known to have COVID-19. Free educational materials from [DHSS](#) and the [CDC](#) on identifying COVID-19 symptoms are available online.
- D. The Board recommends establishing procedures for staff to report potential symptoms or COVID-19 exposure to pharmacy management/the pharmacist-in-charge. Pharmacy management should be trained on appropriate response measures, including, any quarantine requirements. The CDC recommends that workers stay home if they are feeling sick or have a sick family member in their home.
- E. Make sure pharmacy staff are trained on and use proper handwashing techniques. CDC handwashing



recommendations are available online at https://www.cdc.gov/coronavirus/2019-ncov/about/prevention.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fabout%2F-prevention-treatment.html. A free CDC handwashing video is also available online at <https://www.youtube.com/watch?v=d914EnpU4Fo>.

2. WHAT IF A PHARMACY DECIDES TO TEMPORARILY CLOSE?

The Board recognizes that situations could occur that may require the pharmacy to temporarily close. Planning is key! The Board encourages licensees to take proactive steps to adopt emergency response plans before an actual emergency occurs.

In the event a pharmacy has to temporarily close, licensees should take proactive steps to assist patients and avoid interruptions in patient care:

- A. Provide patients as much advance notification as possible. The Board recommends posting signs/notifications in a publicly visible location such as on main entry doors, near the pharmacy area and on the pharmacy's website. Other direct patient notification options should also be considered (e.g., HIPAA compliant texts/e-mails).
- B. Patients should be provided instructions and contact information for contacting the pharmacy/speaking with a pharmacist (phone number/e-mail). To avoid medication interruptions, the Board recommends providing directions for transferring prescriptions, if necessary.
- C. Licensees are reminded that 20 CSR 2220-2.120(5) requires that prescription/medication order transfer requests must be completed within one (1) business day. Once again, licensees should take reasonable measures to assist patients and prevent interruptions in care if the pharmacy is unable to provide a transfer due to illness, quarantine or a closure related to COVID-19.
- D. Please notify the Board if your pharmacy will be closing. Notifications can be made by calling the Board office at (573) 751-0091 or e-mailing MissouriBOP@pr.mo.gov (e-mail is preferred)

3. CAN PHARMACY STAFF WORK FROM HOME?

Missouri law doesn't currently allow pharmacy technicians to work from home. However, the Board is considering emergency options to address/allow off-site technician non-dispensing activities in the event of an emergency. Please monitor the Board's website and e-alerts for future updates.

FOR PHARMACISTS: 20 CSR 2220-6.055 allows pharmacists to perform non-dispensing activities outside of a licensed pharmacy. Authorized non-dispensing activities include, but are not limited to:

- 1) Patient counseling/education
- 2) Obtaining patient history/information
- 3) Reviewing patient records/medical histories
- 4) Consulting with prescribers and other healthcare professionals
- 5) Verifying prescription/medication order (data)
- 6) Clarifying prescription/medication order information



- 7) Patient assessment/evaluation, as authorized by Missouri law
- 8) Medication therapy management
- 9) Billing and insurance claim submissions/ review
- 10) Drug utilization review
- 11) Assessing payor eligibility/coverage
- 12) Pharmacy compliance audits/evaluations
- 13) Administering drugs, vaccines, or biologicals, as authorized by law and the rules of the Board
- 14) Peer review/peer consultations
- 15) Reviewing, selecting, and developing formularies or plan/practice guidelines
- 16) Reviewing compliance with benefit guidelines
- 17) Managing inventory, including purchasing and ordering
- 18) Managing/reviewing information systems
- 19) Patient medication review
- 20) Patient referrals
- 21) Medication therapy management
- 22) Prescription order entry/review, provided that a pharmacist may only accept a prescription on the premises of a Missouri licensed pharmacy (see question # 4)

At this time, remote verification of the final product is not allowed under Missouri law. However, the Board is considering emergency rules to address this issue in the event of an emergency. Visit the Board's [website](#) or sign-up for the Board's [e-alerts](#) for future updates.

4. CAN PHARMACISTS TAKE VERBAL PRESCRIPTIONS/MEDICATION ORDERS OR CALL THE PRESCRIBER TO CLARIFY A PRESCRIPTION/MEDICATION ORDER FROM HOME?

Yes. A pharmacist can perform these activities from home or outside of a licensed pharmacy under 20 CSR 2220-6.055 (Non-Dispensing Activities). However, hard copy prescriptions and facsimile prescriptions can only be accepted at a licensed pharmacy location.

5. CAN STERILE COMPOUNDING PHARMACIES REUSE GARB IN THE EVENT OF A SHORTAGE?

Licensees have expressed concerns with potential shortages of gowns, face masks and shoe covers. The Board recommends talking with your supplier. If a shortage is anticipated, pharmacies should first consider measures to conserve supplies they have on hand. Potential measures could include limiting the number of personnel entering the buffer room/controlled area and modifying staging activities to minimize trips into the buffer room/controlled area.

If you are experiencing a shortage of garb and need to modify your procedures to allow for reuse, appropriate aseptic processes must be followed to maintain the compounding environment and to ensure the proper state of microbial control is preserved. The pharmacy's written policies and procedures must be revised to incorporate modifications and staff should be properly trained on new requirements. To ensure compliance, staff garbing



should be assessed to ensure staff can successfully carry out any modified garbing procedures.

CriticalPoint® LLC has released a webinar entitled “COVID-19: Downstream Implications for Sterile Compounding” which contains information on the reuse of garb due to a shortage. The webinar is available at <https://peernetwork.criticalpoint.info/posts/webinars/covid-19-downstream-implications-for-sterile-compounding>. The free Peer Network Silver subscription will give you access to the recording. Note: CriticalPoint® information is being provided for informational purposes only. The webinar was conducted by a private entity and is not officially endorsed or sponsored by the Board. Recommendations/suggestions are solely those of CriticalPoint and do not necessarily represent the opinions/recommendations of the Missouri Board of Pharmacy. In the event of a conflict, Missouri law will apply. Licensees should review 20 CSR 2220-2.200 (Sterile Compounding) in its entirety to ensure compliance with all applicable requirements.

If your facility is regulated by other agencies (e.g., the Nuclear Regulatory Commission, the Missouri Dept. of Health and Senior Services), please consult those agencies for guidance as well.

6. WHAT ABOUT SHORTAGES OF OTHER PHARMACY SUPPLIES?

It is difficult to determine what shortages may occur in the future (if any). However, the Board will review issues as they arise and may issue additional guidance if needed. In the interim, pharmacists should use their professional judgment to avoid interruptions in patient care and to ensure pharmacy services are safely and properly provided.



*****MISSOURI BOARD OF PHARMACY COVID-19 RELATED LICENSURE UPDATES*** (3-17-20)**

What Happens If The Board Office Closes?

The Board's internal emergency response procedures will be activated in the event state offices are closed for more than one (1) business day or if state employees are authorized to work from home. In either case, Board staff will be remotely processing applications, retrieving voicemails and responding to e-mails. Please e-mail the Board office if you have a question. Staff may have limited capability to respond to voicemails. Board contact numbers and e-mail addresses are attached and are also available online at

<https://pr.mo.gov/pharmacists-questions.asp>

What About Pharmacy Technician Renewals?

Pharmacy technicians will still be able to renew online in the event of an office closure at

<https://pr.mo.gov/renew-jetpay-step0.asp>.

- Renewal PIN requests can be submitted online at: <https://pr.mo.gov/pharmacy-pin-request.asp>. Electronically submitted PIN requests will be processed within one (1) business day. You do not have to call the Board office to request your PIN.
- If you need to change your address before renewing online, address changes can be submitted on the Board's website at <https://pr.mo.gov/pharmacists-coa.asp>. Allow 2-3 business days for processing before trying to renew.
- Duplicate paper renewal requests can be e-mailed to the Board at technician@pr.mo.gov. E-mail requests should come from the pharmacy technician and include the pharmacy technician's address, date of birth and a valid contact phone number. Duplicate renewals will be e-mailed if a valid e-mail address is given and Board staff are able to authenticate the request. Allow 2-3 business days for processing e-mailed requests. Requests for mailed paper renewals (e.g., U.S. Post Office) will experience delays if the Board office is closed.
- At this time, the pharmacy technician renewal deadline has not changed. All pharmacy technician registrations must be renewed by May 31st. The Board will continue to monitor developments and may reconsider extending the renewal deadline, if necessary.

What About New Applicants?

Board staff will be remotely processing applications that are currently on file with the Board office if the Board office is closed. However, please allow additional time for processing.

- Staff may not be able to process new paper applications that are received during or after an office closure. The Board is considering options to accept electronic applications and will notify licensees/applicants if this option becomes available. Please e-mail the applicable licensing desk if you

have an urgent licensing issue. Board contact numbers and e-mail addresses are attached and are also available online at <https://pr.mo.gov/pharmacists-questions.asp>

- The Board has received notification that some IdentoGO® fingerprinting sites will be closed or have limited work hours as a result of COVID-19. At this time, the Board understands the following IdentoGO® locations are closed (*this list has been provided by MACHS and is current as of 3/17/20. The list may have been changed by MACHS since this document was published*):

Saint Peters, MO-Mid Rivers Mall Dr
Warrenton, MO-Steinhagen Rd
Licking, MO-College Ave
Eolia, MO-Vo Tech Rd
Hermann, MO-Blue Pride Dr
Saint Louis, MO-Hampton Ave
Park Hills, MO-Flat River Dr
Warrensburg, MO-S Holden St
Cassville, MO-Fair St

Liberty, MO-W Kansas St
Washington, MO-Grand Ave
Gainesville, MO-3rd St
Walker, MO-E Leslie Ave
Richland, MO-S Pine St
Theodosia, MO-US Highway 160
Marshall, MO-S Odell Ave
Waynesville, MO-Fleetwood Dr.

A list of alternative fingerprinting sites are located on the MACHS website at

<https://www.machs.mo.gov/MACHSFP/home.html>. Please monitor MACHS' website for additional updates and inform applicants.

- **Pharmacy Technicians:** Please remember that pharmacy technicians are authorized to work if a completed registration application has been mailed to the Board. To be complete, the application must include a fingerprint receipt and proof of the required fee. A copy of the completed application must be maintained at the pharmacy. If applicants cannot get fingerprinted at an alternative site due to closures or site unavailability, the Board will allow a pharmacy technician applicant to work if:
 1. A completed pharmacy technician registration application fee and the application fee has been mailed to the Board office, and
 2. The applicant has electronically registered with the Missouri Automated Criminal History System (MACHS) Fingerprint Portal online at <https://www.machs.mo.gov/MACHSFP/wizard.html>, and
 3. The applicant gets fingerprinted as soon as reasonably practical but no later than thirty (30) days after the application is mailed. An extension may be granted by the Board on request if fingerprinting services are still not reasonably available after thirty (30) days, and
 4. An e-mail is submitted to the Board office at technician@pr.mo.gov notifying the Board that an applicant will begin working pending future fingerprinting. The e-mail should include the name of the applicant and the name, address and license number of the pharmacy where the applicant will be working.
 5. Pharmacies should do a reasonable search to determine if the applicant has criminal history that may relate to the practice of pharmacy. Missouri court records can be searched at <https://www.courts.mo.gov/casenet/base/welcome.do>. *Please note this database is not inclusive.*
- **For Pharmacist Applicants:** The Board office will continue to grant authorization to take licensing examinations and issue licenses. However, please allow additional time for processing.
- **Pharmacy/Drug Distributor Applicants:** To protect the health and safety of Board staff, Board inspectors will not be conducting new inspections of Missouri located facilities until further notice, absent an emergency or urgent need. Please e-mail your Inspector or pharmacy@pr.mo.gov if you need an emergency/urgent inspection.

- Work from Home Options: The Board is currently reviewing allowing pharmacy staff to work from home. Additional updates may be provided shortly. Please monitor the Board's websites and e-alerts.

Can Individuals Licensed In Another State Practice in Missouri?

The Board does not have authority to waive Missouri's licensing requirements for individuals licensed in another state, absent an Executive Order or other statutory authority. The Board will monitor developments and update licensees if there are any changes.

What About Pharmacist Notifications of Intent?

Notifications of Intent (NOI) to immunize by protocol or to administer by medical prescription order can still be electronically filed on the Board's website at: <https://pr.mo.gov/pharmacy-notification.asp>. Licensees may begin immunizing/administering medication once a completed NOI has been filed and all other rule requirements have been met.

Licensees have asked if they may continue immunizing/administering medication if their CPR/BLS certification is expired and they are unable to update their CPR/BLS training because classes have been canceled/postponed due to COVID-19. In light of Executive Order 2020-02, the Board will exercise its enforcement discretion and will allow licensees who are unable to update their CPR/BLS certification due to class cancellations/unavailability to continue immunizing or administering medication if:

1. The pharmacist has a current NOI on file with the Board, and
2. The required CPR/BLS training is completed as soon as reasonably practical. Documentation of completion should be maintained in the pharmacist's records. *Note: This allowance applies to pharmacists who currently have a NOI on file with the Board. New NOI applicants must complete the required CPR/BLS training prior to filing their initial NOI, however, the Board may reconsider this requirement as developments unfold.*

BNDD INFORMATION:

(The following statement is from the Missouri Bureau of Narcotics and Dangerous Drugs)

Staff within the Bureau of Narcotics and Dangerous Drugs may begin to process applications for registration remotely. In order to expedite your application we ask that, going forward, all applications be submitted online with our click-to-pay feature. This will avoid delays in the application process due to handling of physical mail. The bureau will be able to process online applications remotely without an interruption in service. If you need to send an attachment along with your application, email it to BNDD@health.mo.gov.

Missouri Board of Pharmacy

Contact Information

3605 Missouri Boulevard, Jefferson City, MO 65109

Email: MissouriBOP@pr.mo.gov

Phone: 573-751-0091 Fax: 573-526-3464

<http://pr.mo.gov/pharmacist>

Department	Email	Phone	Topic(s)
Pharmacy	Pharmacy@pr.mo.gov	573-526-6985	Pharmacist-in-Charge, Pharmacy Applications, Change of Ownership, Change in Classification, Out of Business notification, License verifications, Renewals
Drug Distributor	drugdistributor@pr.mo.gov	573-526-6985	Manager-in-Charge, Pharmacy Applications, Change of Ownership, Change in Classification, Out of Business notification, License verifications, Renewals
Pharmacist	Pharmacist@pr.mo.gov	573-522-1448 (A-M) 573-751-0092 (N-Z)	Pharmacist Applications, License Verifications, MTS, Continuing Education, Renewals, Notification of Intent
Pharmacist Intern	Intern@pr.mo.gov	573-522-1448 (A-M) 573-751-0092 (N-Z)	Intern Applications, License Verifications, Site/Preceptor Applications, Affidavit of Intern Hours, Renewals, PIN# requests
Pharmacy Technician	Technician@pr.mo.gov	573-522-2425	Pharmacy technician applications/verifications, Renewals, PIN # requests
Complaint	MissouriBOP@pr.mo.gov	573-751-0091	File a complaint, check the status of a complaint
Legal/Compliance	compliance@pr.mo.gov	573-751-0091	Discipline, Compliance, CE Audit, MTS Audit
General Requests	MissouriBOP@pr.mo.gov	573-751-0091	General inquiries that do not fall under the categories above

*****MISSOURI BOARD OF PHARMACY
COVID-19 RULE UPDATES***
(3-20-20)**

On March 13, 2020, Governor Parsons issued [Executive Order 2020-02](#) which declared a State of Emergency after confirmed and/or presumptive positive cases of COVID-19 in Missouri. Governor Parsons subsequently issued Executive Order 2020-04 which granted Boards within the Division of Professional Registration authority to temporarily waive or suspend the operation of statutory rule or administrative requirements to best serve public health and safety.

Pursuant to [Executive Order 2020-04](#), the following provisions of Missouri law are being waived during the State of Emergency subject to the following restrictions/requirements:

STATUTE/RULE WAIVED	Description
§ 338.200.1(2)	<u>Emergency Dispensing</u> : Pharmacies may dispense an emergency supply of medication to a patient if the pharmacy that originally filled the prescription is closed or unable to fill the prescription due to the State of Emergency. Pharmacists must make a good faith effort to verify the medication to be dispensed and the authorized prescriber and dosage form (e.g., as listed on the patient's prescription vial). <i>**This waiver applies to non-controlled substances only; § 338.200 does <u>not</u> apply to controlled substances.**</i>
§ 338.200.2(1)	<u>Emergency Dispensing</u> : Pharmacies/pharmacists may dispense up to a thirty (30) day supply of emergency medication pursuant to § 338.220 during the State of Emergency. For unit of use medications that exceed a 30 day supply, the smallest unit of use available in inventory may be dispensed for emergency purposes.
20 CSR 2220-2.010(1)(A)	<u>Dispensing Verified Medication</u> : Pharmacy technicians or an intern pharmacist may dispense medication to the patient when a pharmacist is not physically present in the pharmacy due to the State of Emergency if: <ol style="list-style-type: none"> 1) The medication has been previously verified by a pharmacist and approved for dispensing, 2) Dispensing is necessary for patient safety or to provide disaster or emergency relief, and 3) Dispensing without the pharmacist present is approved by a pharmacist or pharmacy in advance.
20 CSR 2220-2.010(1)(B)	<u>Remote Product Verification</u> : To prevent illness and staffing shortages, a pharmacist may use technology to remotely verify the final product as required by 20 CSR 2220-2.010 if needed to provide disaster or emergency relief if: <ol style="list-style-type: none"> 1. Physical verification by a pharmacist cannot be promptly performed by a pharmacist;

	<p>2. Prompt dispensing is in the best interest of the patient's health and safety;</p> <p>3. The technology used is sufficient to allow the pharmacist to properly and accurately inspect and verify the accuracy of the contents of the prescription or medication order and the affixed label, and</p> <p>4. If the pharmacy technician or intern pharmacist is supervised in compliance with proposed rule 20 CSR 2220-2.710 published in the Missouri Register on March 16, 2020. In lieu of the required initial competency assessment referenced in 20 CSR 2220-2.710(2)(C), pharmacy technicians and intern pharmacists must be deemed competent to perform the duties assigned by the pharmacist-in-charge.</p>
20 CSR 2220-2.200(10)(B)	<p><u>Sterile Compounding</u>: Pharmacies engaged in sterile compounding may accept Aseptic Technique Skill Assessment results (including media-fill testing) from another pharmacy for the same staff member, if needed to prevent interruptions in patient care or to ensure availability of pharmacy services during the State of Emergency. However, pharmacy technicians should be trained on pharmacy operational procedures to ensure proper aseptic technique.</p>
20 CSR 2220-2.650	<p><u>Class-J Shared Services</u>: During the State of Emergency, a Missouri licensed pharmacy may provide shared pharmacy services identified in 20 CSR 2220-2.650 for another Missouri licensed pharmacy without a Class-J Shared Services permit, if the shared services are necessary to prevent interruptions in patient care as a result of pharmacy closures, limited staffing or interruptions in pharmacy operations due to COVID-19. Both pharmacies must comply with 20 CSR 2220-2.650 with the following exceptions:</p> <ol style="list-style-type: none"> 1. A common database or shared real-time access to each pharmacy's electronic medication or prescription system is not required during the State of Emergency, if such database or real-time access cannot be promptly arranged in sufficient time to meet patient care needs during the State of Emergency. Pharmacists should use their professional judgment to ensure appropriate patient care and medication dispensing. 2. Pharmacies may participate in a shared services arrangement authorized by this directive without a written contract outlining authorized shared services required by 20 CSR 2220-2.650(1)(A)1. or the policy and procedure manual required by 20 CSR 2220-2.650(1)(C)1., if such contract or policy/procedure manual cannot be timely completed to meet patient needs during the emergency. However, authorized shared services should be documented in advance in writing, including, designation of the pharmacy responsible for offering patient counseling as required by 20 CSR 2220-2.190 and federal law. 3. Pharmacies operating under the above allowances must comply with all provisions 20 CSR 2220-2.650 once the State of Emergency ends or upon Board termination of this authorization. A Class-J Shared Services permit and full compliance with the rule will be required at the end of the State of Emergency/Board authorization. <p>*** <i>The above allowances only apply to pharmacies providing shared services to a Missouri licensed pharmacy to prevent interruptions in patient care as a result of pharmacy closures, limited staffing or interruptions in pharmacy operations due to COVID-19.</i></p>

	<i>All other pharmacies/shared services arrangements must comply with 20 CSR 2220-2.650.</i>
20 CSR 2220-6.055(6)	<u>Non-Dispensing Activities</u> : Pharmacists may use pharmacy technicians and intern pharmacists to assist a pharmacist with non-dispensing functions from an off-site non-pharmacy location during the State of Emergency. Pharmacists should use their professional judgment to ensure technicians/intern pharmacists are appropriately supervised.
20 CSR 2220-2.700(1) & 20 CSR 2220-6.055(6)	<u>Remote Data Entry</u> : Pharmacy technicians and intern pharmacists may perform remote data entry activities from home or outside of a licensed pharmacy, if the pharmacy complies with the provisions of proposed rule 20 CSR 2220-2.725 published in the Missouri Register on March 16, 2020. In lieu of the required initial competency assessment referenced in proposed 20 CSR 2220-2.725(3)(C), pharmacy technicians and intern pharmacists may perform authorized remote data entry functions if approved and deemed competent to perform the duties assigned by the pharmacist-in-charge.

The above waivers are intended to address the State of Emergency and should not be used for pharmacy convenience or to decrease costs. The Board will continue to monitor waiver requests and may issue further guidance as events develop. Pharmacists are vital members of the healthcare team and can play a critical role in providing patient care during the State of Emergency. Pharmacists should exercise their professional judgment to ensure safe and appropriate patient care. Questions can be addressed to the Board office at (573) 751-0091 or at MissouriBOP@pr.mo.gov. Due to the volume of phone calls at this time, e-mails are preferred.

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SALUS POPULI SUPREMA LEX ESTO

“The welfare of the people shall be the supreme law.”



JOHN R. ASHCROFT
SECRETARY OF STATE

MISSOURI REGISTER

**Title 20—DEPARTMENT OF COMMERCE AND
INSURANCE
Division 2095—Committee for Professional Counselors
Chapter 3—Professional Responsibility**

PROPOSED AMENDMENT

20 CSR 2095-3.015 Client Welfare. The committee is amending sections (1) and (7).

PURPOSE: This rule is being amended to address the need for a client or patient to understand the parameters of distance based counseling.

(1) Before beginning a therapeutic relationship, a counselor shall explain and document the following elements of informed consent:

(G) Limits to confidentiality regarding individual, couple, family, and group therapy; *[and]*

(H) If utilized, taping or recording of sessions, and how the tapes will be used and stored.; *and*

(I) When using technology in the course of providing professional counseling, how such technology is in compliance with federal and state legal and ethical requirements.

(7) A counselor providing therapeutic services to a client shall maintain records that include the following:

(A) Informed consent as defined in *[subsections (1)(A)–(H)]* section (1);

AUTHORITY: section[s] 337.520, *RSMo Supp. 2019*, and section 337.525, *RSMo [2000] 2016*. This rule originally filed as 4 CSR 95-3.015. Original rule filed Dec. 1, 2004, effective June 30, 2005. Moved to 20 CSR 2095-3.015, effective Aug. 28, 2006. Amended: Filed Feb. 14, 2020.

PUBLIC COST: This proposed amendment will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed amendment will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed amendment with the Committee for Professional Counselors, PO Box 1335, 3605 Missouri Boulevard, Jefferson City, MO 65102-1335, by facsimile at (573) 751-0018, or via email at prof counselor@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the *Missouri Register*. No public hearing is scheduled.

**Title 20—DEPARTMENT OF COMMERCE AND
INSURANCE
Division 2220—State Board of Pharmacy
Chapter 2—General Rules**

PROPOSED RULE

20 CSR 2220-2.710 Pharmacy Technician and Intern Pharmacist Supervision

PURPOSE: This rule defines the required supervision for pharmacy technicians and intern pharmacists.

(1) Pharmacy technicians and intern pharmacists may assist a pharmacist in the practice of pharmacy as authorized by Chapter 338, *RSMo*, and the rules of the board, provided delegated tasks are per-

formed under the direct supervision of a pharmacist. Direct supervision means supervision by a Missouri licensed pharmacist who is readily and immediately available at all times the delegated tasks are being performed and who provides personal assistance, direction, and approval throughout the time the delegated tasks are being performed. “Readily and immediately available” means the pharmacist and pharmacy technician(s) or intern pharmacists are on the same physical premises, or if not, technology is used to communicate with and observe the pharmacy technician and intern pharmacist, as authorized in section (2).

(2) Use of Technology. Except as otherwise provided by law or regulation, technology may be used to directly supervise a pharmacy technician and intern pharmacist, provided:

(A) Sufficient technology is available to allow communication between the pharmacist and the pharmacy technician or intern pharmacist in a manner that is sufficient to provide the personal assistance, direction, and approval required to verify and ensure delegated tasks are safely and properly performed. Technicians and intern pharmacists may not be supervised as authorized by this subsection if the required technology is not operating or available;

(B) All applicable state and federal laws are fully observed, including, but not limited to, all applicable privacy and confidentiality laws;

(C) The pharmacy technician or intern pharmacist has completed employer approved training in the activities performed and has an initial and annual documented assessment of competency. Documentation of the completed training and competency assessment must be maintained in the pharmacy’s records for a minimum of two (2) years and provided to the board or the board’s designee upon request; and

(D) The supervising pharmacist and the permit holder must maintain a sufficient audit trail of prescription/medication order data entry and modifications to a patient record performed by a pharmacy technician or intern pharmacist being supervised as authorized by this subsection. The record must include the identity of the pharmacy technician or intern pharmacist performing the data entry or modification and must be maintained in the pharmacy’s records for a minimum of five (5) years.

(3) The supervising pharmacist and permit holder shall retain responsibility for activities delegated to a pharmacy technician or intern pharmacist.

(4) Nothing in this rule shall override the provisions of 20 CSR 2220-2.010.

AUTHORITY: sections 338.010 and 338.140, *RSMo Supp. 2019*, and sections 338.013, 338.035, and 338.280, *RSMo 2016*. Original rule filed Feb. 7, 2020.

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed rule will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed rule with the Missouri Board of Pharmacy, PO Box 625, 3605 Missouri Boulevard, Jefferson City, MO 65102, by facsimile at (573) 526-3464, or via email at pharmacy@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the *Missouri Register*. No public hearing is scheduled.

**Title 20—DEPARTMENT OF COMMERCE AND
INSURANCE
Division 2220—State Board of Pharmacy
Chapter 2—General Rules**

PROPOSED RULE

20 CSR 2220-2.725 Remote Data Entry

PURPOSE: This rule authorizes and establishes requirements for remote data entry sites.

(1) Definitions.

(A) “Remote Data Entry Sites”—A remote site located in Missouri that is operated by a Missouri licensed pharmacy and used by a pharmacy technician or intern pharmacist to electronically perform non-dispensing data entry functions, including, but not limited to, obtaining, entering, validating, or processing patient information or data.

(B) “Supervising Pharmacy”—A Missouri licensed pharmacy that is physically located in Missouri and responsible for operating a remote data entry site.

(2) Licensing.

(A) “Remote Data Entry Sites”—A permit is not required for a remote data entry site. The site shall be deemed part of and operating under the supervising pharmacy’s permit. The supervising pharmacy must maintain an address listing of all remote data entry sites in operation which must be made immediately available upon request of the board or the board’s authorized designee.

(3) Remote data entry sites must be safely operated in compliance with applicable state and federal law. The supervising pharmacy is responsible for all pharmacy operations at the remote data entry site. No medication or medical device may be located at or dispensed from a remote data entry site.

(A) Adequate security and supervision must be maintained at all times to prevent unauthorized access to the remote data entry site and equipment. Confidential records must be securely maintained to prevent unauthorized access to, and unauthorized storage/transfer of, confidential information. Any breach in the security of the remote data entry site equipment or confidential records must be documented and reported to the board in writing within seven (7) days of the breach. Paper patient or prescription records may not be generated, located, or maintained at a remote data entry site.

(B) Except as otherwise provided by state and federal requirements, the remote data entry site and the supervising pharmacy must share a common database or prescription record-keeping system that allows real-time, online access to relevant patient profile information by both the supervising pharmacy and the remote site. The identity of the pharmacy technician or intern pharmacist responsible for remotely entering, validating, or modifying data at a remote data entry site must be electronically documented/recorded in the pharmacy’s records and maintained for a minimum of five (5) years.

(C) Pharmacy technicians and intern pharmacists operating at a remote data entry site must be competent in the duties performed. At a minimum, technicians and intern pharmacists must have completed employer approved training in the activities performed remotely and must have an initial and, if applicable, annual documented assessment of competency. Documentation of the completed training and competency assessment must be maintained in the pharmacy’s records for a minimum of two (2) years and provided to the board or the board’s designee upon request;

(D) A sufficient mechanism must be in place to allow communication between the supervising pharmacist and pharmacy technician or intern pharmacist when needed. A pharmacist must be available to respond to technician/intern pharmacist questions at all times a remote data entry site is in operation and must provide the personal

assistance, direction, and approval required to verify and ensure delegated tasks are safely and properly performed. Non-dispensing data entry functions may not be performed by a pharmacy technician or intern pharmacist at a remote data entry site if the required real-time communication mechanism is not operating or available.

(E) Remote data entry sites may be inspected by the board as authorized by law. Notification by the inspector will be provided to the supervising pharmacy a minimum of seventy-two (72) hours ahead of the scheduled inspection. The supervising pharmacy permit holder must arrange for a designated representative to be present that is not a resident of the location under inspection.

(4) Policies and Procedures. The supervising pharmacy must establish written policies and procedures governing all aspects of operation of a remote data entry site that are reviewed annually by the pharmacist-in-charge. At a minimum, policies and procedures must include authorized technician and intern pharmacist activities, site security procedures and requirements, reporting security breaches, quality assurance review procedures, and staff education/training. The annual policy and procedure review date must be documented in the pharmacy’s records.

AUTHORITY: sections 338.010 and 338.140, RSMo Supp. 2019, and sections 338.013, 338.035, and 338.280, RSMo 2016. Original rule filed Feb. 7, 2020.

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed rule will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed rule with the Missouri Board of Pharmacy, PO Box 625, 3605 Missouri Boulevard, Jefferson City, MO 65102, by facsimile at (573) 526-3464, or via email at pharmacy@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the Missouri Register. No public hearing is scheduled.

**Title 20—DEPARTMENT OF COMMERCE AND
INSURANCE
Division 2220—State Board of Pharmacy
Chapter 6—Pharmaceutical Care Standards**

PROPOSED AMENDMENT

20 CSR 2220-6.055 Non-Dispensing Activities. The board is amending sections (2), (4), and (6).

PURPOSE: This amendment establishes requirements for pharmacy technicians assisting pharmacists with non-dispensing activities authorized by the rule outside of a Missouri licensed pharmacy.

(2) Confidentiality. A pharmacist, **pharmacy technician, or intern pharmacist** performing non-dispensing activities pursuant to this rule shall comply with all applicable state and federal confidentiality laws and regulations *[and shall provide]*. *[s]*/Sufficient storage and security for confidential documents and electronic data processing hardware **must be provided by the pharmacy permit holder or the pharmacist**. In addition, data processing systems must utilize sufficient security software to ensure confidentiality and prevent unauthorized access. Any breach in the security or confidentiality of the data processing systems or confidential documents shall be documented and reported to the board in writing within seven (7) days of the breach.

(4) A pharmacist, **pharmacy technician, or intern pharmacist** performing non-dispensing activities pursuant to this rule shall ensure compliance with Chapter 338, RSMo, and the rules of the board at all times. Nothing in this rule shall be construed to eliminate or otherwise exempt any pharmacist, **pharmacy technician, intern pharmacist, or pharmacy permit holder** from the record-keeping, confidentiality, or security requirements otherwise imposed by Chapter 338, RSMo, or the rules of the board. Violations of this section shall constitute grounds for discipline.

[(6) A pharmacy permit shall be required for performing non-dispensing activities if the pharmacist is using a pharmacy technician to assist in the practice of pharmacy at the location where non-dispensing activities are being performed, provided that a pharmacy permit shall not be required for sites used solely by the pharmacist for administering vaccines as authorized by Chapter 338, RSMo, and the rules of the board. Pharmacy technicians shall only be authorized to work under the direct supervision of a pharmacist as provided by section 338.013, RSMo, and 20 CSR 2220-2.700.]

(6) A pharmacy technician and intern pharmacist may be used to assist a pharmacist with non-dispensing activities outside of a pharmacy subject to the following:

(A) The pharmacy technician/intern pharmacist must be under the direct supervision of a Missouri licensed pharmacist as required by 20 CSR 2220-2.710. The supervising pharmacist must ensure pharmacy technician/intern pharmacist activities comply with state and federal law and must provide the personal assistance, direction, and approval required to verify and ensure delegated non-dispensing activities are safely and properly performed;

(B) The pharmacy technician or intern pharmacist must have completed employer approved training in the activities performed and have an initial and, if applicable, annual documented assessment of proficiency. Documentation of the completed training and proficiency assessment must be maintained in the pharmacy's records for a minimum of two (2) years and provided to the board or the board's designee upon request;

(C) A sufficient mechanism must be in place to allow real-time communication between a pharmacist and the technician/intern pharmacist when needed. A pharmacist must be available to respond to pharmacy technician/intern pharmacist questions at all times non-dispensing activities are being performed; and

(D) Adequate security and supervision must be maintained at all times to prevent unauthorized access to, and unauthorized storage/transfer of, confidential patient information or patient records.

(E) The provisions of this section (6) do not apply to technicians or intern pharmacists engaged in delivering filled prescriptions/medication orders on behalf of the pharmacy as authorized by 20 CSR 2220-2.013.

AUTHORITY: sections 338.010 and [338.220] 338.140, RSMo Supp. [2009] 2019, and sections [338.140] 338.035 and 338.220, RSMo [2000] 2016. Emergency rule filed Oct. 23, 2009, effective Nov. 2, 2009, expired April 30, 2010. Original rule filed Oct. 22, 2009, effective June 30, 2010. Amended: Filed Feb. 7, 2020.

PUBLIC COST: This proposed amendment will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed amendment will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed amendment with the

Missouri Board of Pharmacy, PO Box 625, 3605 Missouri Boulevard, Jefferson City, MO 65102, by facsimile at (573) 526-3464, or via email at pharmacy@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the Missouri Register. No public hearing is scheduled.

*****MISSOURI BOARD OF PHARMACY
COVID-19 SUPPLEMENTAL WAIVERS/GUIDANCE***
(3-23-20)**

The Board is continuing to monitor developments related to COVID-19. Please see the following additional guidance/waivers to assist licensees during the State of Emergency:

Non-Resident Licensing Waiver

Pursuant to [Executive Order 2020-04](#), the following Board licensure waivers have been approved during the State of Emergency:

1. Section [338.020, RSMo](#) (Pharmacist Licensure) has been waived to allow Missouri licensed pharmacies to use individuals licensed as pharmacists in another U.S. state or territory to provide pharmacy services during the State of Emergency, provided such non-resident license is current and in good standing.
2. Section [338.013, RSMo](#) (Pharmacy Technician Registration) has been waived to allow Missouri licensed pharmacies to use individuals licensed/registered as pharmacy technicians in another U.S. state or territory to provide pharmacy services during the State of Emergency, provided such non-resident license/registration is current and in good standing.
3. Section [338.220, RSMo](#) (Pharmacy Licensure) has been waived to allow Missouri licensed pharmacies to use entities licensed as a pharmacy in another U.S. State or territory to assist with providing pharmacy services during the State of Emergency, provided such non-resident license is current and in good standing. A Class-J Shared Services permit is not required during the State of Emergency subject to the requirements identified in the Board's ["Waiver of Statutes/Administrative Rules"](#) statement issued on 3/18/20.

The above non-resident licensing waivers may be utilized if:

1. The Missouri licensed pharmacy maintains proof of the non-resident individual's or entity's licensure/registration in their home state which shows the applicable non-resident license, registration or permit is current and in good standing (e.g., official governmental website verification, copy of current license);
2. For pharmacists and pharmacy technicians, the individual must submit an Emergency Practice Notification Form to the Board office at the Board's mailing address or electronically to:
 - a. MissouriBOP@pr.mo.gov
 - b. Fax: (573) 526-3464

The Emergency Practice Notification Form is attached below and also available on the Board's website. No application fee is required.

Note: The approved non-resident licensing waiver only applies to entities under the Board's jurisdiction and would allow assistance from non-resident licensees/registrations as listed above without a corresponding Missouri license, registration or permit.

Clarification on Remote Verification by a Pharmacist Waiver

Questions have been received by the Board regarding the scope of the remote final product verification waiver approved by the Board in accordance with Executive 2020-04. To prevent illness and staffing shortages, a Missouri licensed pharmacist may use technology to remotely verify the final product as required by [20 CSR 2220-2.010](#) if needed to provide disaster or emergency relief if:

1. Physical verification by a pharmacist cannot be promptly performed by a pharmacist;
2. Prompt dispensing is in the best interest of the patient's health and safety;
3. The technology used is sufficient to allow the pharmacist to properly and accurately inspect and verify the accuracy of the contents of the prescription or medication order and the affixed label, and
4. If the pharmacy technician or intern pharmacist is supervised in compliance with proposed rule [20 CSR 2220-2.710](#) published in the Missouri Register on March 16, 2020. In lieu of the required initial competency assessment referenced in 20 CSR 2220-2.710(2)(C), pharmacy technicians and intern pharmacists must be deemed competent to perform the duties assigned by the pharmacist-in-charge.

The permit holder, pharmacist-in-charge and the supervising pharmacist are responsible for ensuring patient safety, security of the pharmacy and its inventory, and ensuring pharmacy services are provided properly and accurately by the pharmacy in servicing the public.

The authorized remote verification waiver is intended to address COVID-19 related pharmacy needs and is ***"NOT"*** intended as a blanket waiver to accommodate normal pharmacy staffing issues. Licensees should make a good faith effort to maintain required staffing of pharmacist(s) in the operation of the pharmacy, and if required, locate a pharmacist to physically verify the final drug product prior to authorizing remote product verification (e.g., reassigning staff, relief pharmacists). Remote final product verification should only be authorized if a pharmacist cannot be located or assigned to verify the final drug product to be dispensed in a timely manner and prompt dispensing is in the best interest of the patient's health and safety.

Remote final product verification should be a **temporary emergency** solution. All efforts should be made by the permit holder to return to normal operational procedures in staffing the pharmacy once a pharmacist is available to personally verify the final product.

Can Remote Final Product Verification Be Used If The Pharmacy Has A High Prescription Volume?

Once again, the authorized waiver is not intended to address regular or routine pharmacy staffing issues. Instead, remote final product verification may be used if there's an increase in prescription volume and the pharmacy is unable to locate or assign another pharmacist to assist with final product verification in a timely manner due to COVID-19 related operational or staffing issues (e.g., pharmacist quarantine, suspected/confirmed illness, relief staff unavailable).

Can a pharmacy technician prepare prescriptions without a pharmacist physically present if the final product is remotely verified by a pharmacist?

In the event a pharmacist **CANNOT** be physically present at a pharmacy due to COVID-19 and the State of Emergency, a pharmacy technician may prepare a prescription without a pharmacist physically present at the pharmacy only if:

1. A pharmacist determines prompt dispensing is in the best interest of the patient's health and safety; and
2. The final product is remotely verified by a pharmacist using technology that is sufficient to allow the pharmacist to properly and accurately inspect and verify the accuracy of the contents of the prescription or medication order and the affixed label, and

3. The pharmacy technician is supervised using technology that complies with proposed rule [20 CSR 2220-2.710](#) published in the Missouri Register on March 16, 2020, and
4. Other elements of dispensing have been appropriately addressed by a pharmacist either on-site or remotely as part of the dispensing process (e.g., data entry, DUR), and
5. Technology used must maintain patient confidentiality, as required by state and federal law.

Once again, this remote verification waiver is a **temporary emergency** solution. The pharmacy must return to normal staffing requirements in the operation of the pharmacy once a pharmacist is available to supervise and verify the final product as required by 20 CSR 2220-2.010. The permit holder, pharmacist-in-charge and the supervising pharmacist are responsible for ensuring patient safety, security of the pharmacy and its inventory, and ensuring pharmacy services are properly and accurately provided in servicing the public.

Prescription/Medication Order Transfers:

Pharmacies not able to transfer prescriptions within 1-business day as required by 20 CSR 2220-2.120 due to the State of Emergency or COVID-19 related closures/business interruptions, may transfer prescriptions as soon as reasonably practical. Pharmacists should exercise good faith and act promptly to avoid interruptions in patient care. *Note: Pharmacists may transfer prescriptions from home pursuant to 20 CSR 2220-6.055. Pharmacy technicians can transfer prescriptions from home during the State of Emergency (non-controlled substances only), subject to the requirements identified in the Board's ["Waiver of Statutes/Administrative Rules"](#) statement issued on 3/18/20.*

The above waivers are intended to address the State of Emergency and should not be used for pharmacy convenience or to decrease costs. The Board will continue to monitor waiver requests and may issue further guidance as events develop. Pharmacists, pharmacy technicians and intern pharmacists are vital members of the healthcare team and can play a critical role in providing patient care during the State of Emergency. Pharmacists should exercise their professional judgment to ensure safe and appropriate patient care. Questions can be addressed to the Board office at (573) 751-0091 or at MissouriBOP@pr.mo.gov. Due to the volume of phone calls at this time, e-mails are preferred.



EMERGENCY PRACTICE NOTIFICATION FORM

IMPORTANT INFORMATION:

- This Emergency Practice Notification Form is provided pursuant to the Board's COVID-19 Supplemental Waiver/Guidance issued on 3/21/20. Please review the guidance prior to submitting this form.
- This form should be submitted by pharmacists or pharmacy technicians licensed in another U.S. state or territory seeking to assist a Missouri licensed pharmacy due to the COVID-19 related State of Emergency declared on March 13, 2020 (see [Executive Order 20-04](#)). You do not have to submit this form if you hold a Missouri pharmacist or pharmacy technician license or registration and will be practicing in the applicable profession.
- Non-resident licensees must hold a current license in the same profession in their home state. Proof of current licensure must be provided to and maintained by the Missouri licensed pharmacy that you will be assisting (e.g., official governmental website verification, copy of current license)
- This completed form can be mailed to the Board office or electronically sent to:
MissouriBOP@pr.mo.gov
Fax: (573) 526-3464
- **No application fee is required.**
- Non-resident licensees may begin practicing once this form is submitted/mailed to the Board office. An official license/registration will not be issued by the Board. Non-resident licensees should maintain a copy of this completed Notification Form in their possession along with proof of mailing/electronic submission. A copy of the completed Notification Form should also be maintained by the Missouri licensed pharmacy that you will be assisting.
- Questions can be addressed to the Board office at (573) 751-0091 or:
pharmacist@pr.mo.gov (pharmacists)
technician@pr.mo.gov (pharmacy technicians)

E-MAIL IS PREFERRED



EMERGENCY PRACTICE NOTIFICATION FORM

MISSOURI BOARD OF PHARMACY EMERGENCY PRACTICE NOTIFICATION FORM

STATE OF MISSOURI DIVISION OF PROFESSIONAL REGISTRATION MISSOURI BOARD OF PHARMACY	MAILING ADDRESS: MISSOURI BOARD OF PHARMACY PO BOX 625 JEFFERSON CITY, MO 65102 OVERNIGHT ADDRESS: 3605 MISSOURI BLVD. JEFFERSON CITY, MO 65109	FOR OFFICE USE ONLY
<ul style="list-style-type: none">- For faster processing, this form can be e-mailed to MissouriBOP@pr.mo.gov or faxed to: (573) 526-3464- Due to the State of Emergency, non-resident licensees may begin assisting a Missouri licensed pharmacy once this completed Notification Form is mailed, e-mailed or faxed to the Board office. An official license/registration will not be issued by the Board.- KEEP COPY OF COMPLETED NOTIFICATION FORM FOR YOUR RECORDS- QUESTIONS: E-MAIL: pharmacist@pr.mo.gov or call (573) 751-0092		RECEIVED DATE:

PERSONAL INFORMATION

Provide information for the non-resident licensee/registrant who will be assisting with pharmacy services due to the State of Emergency (Executive Order 2020-02 & 2020-04)

INDIVIDUAL NAME (LAST) (FIRST) (MIDDLE) (MAIDEN)	SOCIAL SECURITY NUMBER	
ADDRESS (STREET) (CITY) (STATE) (ZIP)		
DATE OF BIRTH (DD/MM/YYYY)	CONTACT TELEPHONE NUMBER	CONTACT E-MAIL ADDRESS
PROFESSION: <input type="checkbox"/> PHARMACIST <input type="checkbox"/> PHARMACY TECHNICIAN	U.S. STATE/TERRITORY WHERE LICENSED/REGISTERED	LICENSE/REGISTRATION # IN RESIDENT STATE
IS THE ABOVE NON-RESIDENT LICENSE/REGISTRATION CURRENT AND ACTIVE IN YOUR HOME STATE? <input type="checkbox"/> YES <input type="checkbox"/> NO (If "no", you are NOT eligible to provide emergency assistance in the state of Missouri)		

MISSOURI PHARMACY INFORMATION

NAME OF MISSOURI LICENSED PHARMACY YOU WILL BE ASSISTING DURING THE STATE OF EMERGENCY	MISSOURI PHARMACY PERMIT #
MISSOURI PHARMACY ADDRESS (STREET) (CITY) (STATE) (ZIP)	
DATE NON-RESIDENT WILL BEGIN ASSISTING FUNCTIONS (MM/DD/YY)	
<i>This section may be left blank if you do not know the Missouri pharmacy that you will be assisting at this time. Non-resident licensees/registrants assisting multiple Missouri pharmacies should list the primary location where you will be practicing. Once this form is submitted, you may assist any Missouri licensed pharmacy subject to Executive Order 20-04 and the Board's COVID-19 Supplemental Waiver/Guidance issued on 3/21/20. Additional Board notification is not required if the pharmacy listed above changes or if you being assisting another Missouri pharmacy. However, a copy of this Notification Form should be maintained/provided to each pharmacy you will be assisting.</i>	

APPLICANT DECLARATION

By my signature below, I affirm that I have personally completed the foregoing notification form and that all information is true and accurate. I further affirm that I hold a current and active pharmacist/pharmacy technician license or registration in my practicing home state. I understand that my authorization to practice in Missouri or for Missouri patients shall automatically terminate once the State of Emergency identified in Executive Order 2020-04 terminates or the non-resident emergency practice waiver is rescinded by the Board of Pharmacy and that practicing after such termination/rescission will constitute unlawful unlicensed practice which may result in civil and/or criminal action, as authorized by law. I agree to abide by all applicable provisions of state and federal law, including, but not limited to, Chapter 338, RSMo, and the rules of the Board, as amended or duly waived by the Board of Pharmacy.

SIGNATURE OF APPLICANT	DATE
PRINT NAME	



****JOINT STATEMENT FROM THE
MISSOURI STATE BOARD OF REGISTRATION FOR THE HEALING ARTS
AND THE MISSOURI BOARD OF PHARMACY****

The Missouri State Board of Registration for the Healing Arts and the Missouri Board of Pharmacy have recently received increased reports of prescriptions being issued for hydroxychloroquine, chloroquine and azithromycin for prophylactic purposes in response to the COVID-19 outbreak. Concerns have been raised that this activity may lead to stockpiling of medication, inappropriate use and potential drug shortages for patients with a legitimate need. To protect the public health and safety, licensees are reminded of the following:

For Prescribers: To prevent drug shortages, the Board recommends the following:

- Prescribing hydroxychloroquine, chloroquine and azithromycin for COVID-19 prophylactic use is discouraged and not recommended by the Board;
- Prescribing hydroxychloroquine, chloroquine and azithromycin for family, friends and co-workers in anticipation of a COVID-19 related illness can significantly impact drug supplies and may lead to improper use. Prescribers should exercise caution and refrain from prophylactic prescribing in light of the State of Emergency.
- The Board of Pharmacy is suggesting that prescribers include the diagnosis code or diagnosis with the prescription. This may prevent calls from the pharmacy and prevent dispensing delays.
- Prescribers should consider limiting the amount prescribed, unless otherwise deemed medically appropriate by the prescriber. [e.g., 14-day supply, etc.]

For Pharmacies:

- Pharmacists should use their professional judgment and take appropriate steps to verify that newly issued prescriptions for hydroxychloroquine, chloroquine and azithromycin are issued for a legitimate medical purpose. To prevent drug shortages, the Board recommends contacting prescribers to confirm the diagnosis for patients newly prescribed these medications during the State of Emergency.
- The Board recommends that licensees limit supplies of hydroxychloroquine, chloroquine and azithromycin prescribed for presumptive COVID-19 positive patients or prophylactic use. Multiple states have adopted a 14-day supply limit. While Missouri has not adopted a similar limit at this time, licensees should consider limiting dispensing for patients newly prescribed hydroxychloroquine, chloroquine or azithromycin during the State of Emergency without a supporting medical diagnosis.
- The Board is not recommending that pharmacies refuse to fill, the Board is recommending that pharmacies use caution.

While both Boards are recommending caution, licensees should avoid interruptions in care for patients previously established on these medications with an appropriate medical diagnosis. The Boards recognize this may be a difficult balance, however, licensees should make a good faith effort to ensure appropriate prescribing, dispensing and patient care.